UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS McALLEN DIVISION

United States District Court Southern District of Texas FILED

APR **28** 2015

David J. Bradley, Clark

UNITED STATES OF AMERICA	§ 8		
v.	999	Criminal No.	M-14-841-S2
GUSTAVO VARGAS-AGUILAR	§		
ANGEL MARTIN MEZA	§		
JENNIFER RODRIGUEZ	§		
ROBERTO CARLOS FLORES-GARCIA	§		
also known as "Comandante"	§		
XOXXXXXXXXXXXX OLGA LYDIA LIRA	§	5/7/15/1c	
aka: OLGA LIRA 2nd SUPERSED	INC	G INDICTMENT	<u>r</u>

THE GRAND JURY CHARGES:

Count One

On or about May 16, 2014, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

GUSTAVO VARGAS-AGUILAR ANGEL MARTIN MEZA JENNIFER RODRIGUEZ ROBERTO CARLOS FLORES-GARCIA also known as "Comandante"

OLGA LYDIA LIRA aka: OLGA LIRA

knowing and in reckless disregard of the fact that individuals, who were aliens, had come to, entered and remained in the United States in violation of law, did knowingly and intentionally conspire and agree together and with other persons known and unknown to the Grand Jurors to transport and move said aliens within the United States in furtherance of such violation of law, that is from a location near La Joya, Texas, to another location near La Joya, Texas, by means of a motor vehicle.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii), 1324(a)(1)(A)(v)(I), and 1324(a)(1)(B)(i).

Count Two

On or about May 16, 2014, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

GUSTAVO VARGAS-AGUILAR
ANGEL MARTIN MEZA
JENNIFER RODRIGUEZ
ROBERTO CARLOS FLORES-GARCIA
also known as "Comandante"

and
OLGA LYDIA LIRA aka: OLGA LIRA

knowing and in reckless disregard of the fact that Isias Aguilar-Perez was an alien who had come to, entered, and remained in the United States in violation of law, did knowingly transport, move, attempt to transport, and attempt to move said alien within the United States in furtherance of such violation of law, that is, from a location near La Joya, Texas, to another location near La Joya, Texas, by means of a motor vehicle, for the purpose of commercial advantage and private financial gain.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii), 1324(a)(1)(A)(v)(II), and 1324(a)(1)(B)(i).

Count Three

On or about May 16, 2014, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

GUSTAVO VARGAS-AGUILAR
ANGEL MARTIN MEZA
JENNIFER RODRIGUEZ
ROBERTO CARLOS FLORES-GARCIA
also known as "Comandante"
and

OLGA LYDIA LIRA aka OLGA LIRA

knowing and in reckless disregard of the fact that Elidio Flores-Lopez was an alien who had come to, entered, and remained in the United States in violation of law, did knowingly transport, move, attempt to transport, and attempt to move said alien within the United States in furtherance of such violation of law, that is, from a location near La Joya, Texas, to another location near La Joya, Texas, by means of a motor vehicle, for the purpose of commercial advantage and private financial gain.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii), 1324(a)(1)(A)(v)(II), and 1324(a)(1)(B)(i).

A RUE BILL

KÖREPERSON

KENNETH MAGIDSON UNITED STATES ATTORNEY

ASSISTANT UNITED STATES ATTORNEY